



## Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact [support@jstor.org](mailto:support@jstor.org).

ting the owner of the land to needless expense for counsel fees and other incidentals. An action in tort was brought to recover damages for this loss to the landowner, and the case was held to be one of *damnum absque injuria*. The English courts maintain, in similar cases, a rule quite as stringent as this (2 Addison on Torts, § 863).

*Assessment—Rule in Assessment of Mill Property.*—*Troy Cotton & Woolen Manufactory v. City of Fall River*, 46 N. E. Rep. 99 (Mass.). It is found that the land, buildings and machinery of a mill, which are subject to local taxation, are in the aggregate more valuable when kept together and used for mill purposes, than if one is separated from the other, and when all are owned by the same person or corporation each item should be valued as it is used in connection with the others, though the land alone would be more valuable for other purposes. The court extends the rule declared in *Tremont and Suffolk Mills v. City of Lowell*, 163 Mass. 283, 39 N.E. 1028, to the machinery used in manufacturing establishments which is locally taxable in connection with the land and buildings thereon.

*Master and Servant—Wrongful Discharge.*—*Tickler v. Andrae Manuf'g Co.*, 70 N. W. Rep. 292 (Wis.). In an action for wrongful discharge a servant cannot recover his expenses in seeking other employment, even though his wages in such other employment are charged in reduction of his damage.

## NEGOTIABLE PAPER.

*Check—What Constitutes—Indorsement on Architect's Certificate.*—*Industrial Bank of Chicago v. Bower*, 46 N. E. Rep. 10 (Ill.). An architect's certificate recited that a certain sum was due the contractor, the E. B. Co. P. H. & Co. had made a building loan to the owner which was drawn on such certificates as needed. The owner wrote on the back of the certificate: "P. H. & Co., Pay to the order of the E. B. Co., John R. Bowes." Held, that although the drawees were not bankers, the indorsement constituted a check and not a bill of exchange. 64 Ill. App. 300 reversed.

*Note—Sufficiency of Consideration.*—*Irwin v. Lombard University*, 46 N. E. Rep. 63 (Ohio). A note given for certain defined educational purposes, which were carried out, is upon a sufficient con-